## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

CITIBANK, N.A AS TRUSTEE FOR AMERICAN HOME MORTGAGE ASSETS TRUST 2006-3, MORTGAGE BACKED PASS-THROUGH CERTIFICATES SERIES 2006-3

VS

C.A. NO:1:18-ev-427-JJM

## KATHERINE L. CAITO INTERNAL REVENUE SERVICE

## AFFIDAVIT OF JOSEPH C. MANERA, JR.

- I, Joseph C. Manera, Jr., being duly sworn, state the following:
- 1. I am an attorney at law, with an office located at 1062 Reservoir Avenue, Cranston, Rhode Island 02920.
- 2. I have been licensed as an attorney in the State of Rhode Island since 1974.
- 3. A significant portion of my law practice as an attorney has consisted of real estate closings and title searches.
- 4. I am familiar with the charges for title searches and title reports.
- 5. I have regularly conducted title searches and have hired title abstractors to do title searches and am familiar with the normal and reasonable cost for such title searches and title reports.

- 6. I have reviewed Exhibit A, attached to this affidavit, which indicates that there was a \$282.00 charge for a title report charged to the Defendant on November 6, 2019.
- 7. The Defendant's property is located in Westerly where titles can be searched online.
- 8. The charge of \$282.00 for a Title Report in November, 2015 is not a reasonable charge for a title search and title report by a non- attorney. A reasonable charge for a non-attorney is no more than \$150.00, which involves running the title from the start date and preparing a conclusion sheet. After the conclusion sheet is prepared, a report on title or a Title commitment would be issued stating the status of the title. A Title Commitment is prepared by the Title Company, which insures the title.
- 9. If the search is done online, then the reasonable charge should be reduced below \$150.00.
- 10. I based my conclusions on upon my experience as a Title Attorney and an Attorney who has done title searches and title reports and because I am familiar with the costs and charges for title searches and title reports since 1974.

JOSEPH C. MANERA, JR.

Subscribed and sworn to before me on July 17, 2019 under the pains and penalties of perjury.

NOTARY PUBLIC

## **EXHIBIT A**

Case 1:18-cv-00427-JJM-LDA Document 21-4 Filed 05/15/19 Page 2 of 3 PageID #: 271 Fige 1 Filed 05/15/19 Page 2 of 3 PageID #: 271 Figure 1 Filed 05/15/19 Fige 1 Filed 05/15/19 Fige 1 Filed 05/14/2019 Figure 1 Filed 05/15/19 File

PROP: 16 Yosemite Valley Rd Westerly RI 02891-5622				•		Š					ESCRUM BAL:	30.00			
	11ley Rd 1891-5622				MAIL: 1200 Reservation 1	1 26				1					
Date D Payment P Due R	Date A Payment T Received D	Date Assessel/ Transaction Date	Description	Amount Applied/ Assessed	Principal Application	Interest	BScrow Application	Optional Products	Late Charges 1	Fees/ Other (See Description)	Suspense	Principal Balance	ES Bal	Suspense	
12		12/04/2013			0.00 -4,622,474.40 0.00	00.00	0.00	0.00	8,070.55 0.00 0.00	-859.53 0.00 -10.50	0.00	4,622,474.40 4,622,474.40 0.00	00.00	8888	
		04/01/2013	Property inspection Fee Property Inspection Fee Property Valuation	-108.00	0.00	00.0	00.00	0.00	0.00	-10.50	0.00	00.0		0.00	
	, 00	15/20/2013	Property Inspection Fee Property Inspection Fee	-10.50	0.00	0.00	0.0	0.00	00.0	10.50	00.0	0.00		0.00	
07/01/2013	9	06/28/2013	Property Inspection Fee Late Charge Assessment	-1,203.70	0.00	8 8 8	888	00.0	-1,203.70	0.00	0.00	0.00		0.00	
	.0	07/23/2013	Skip Trace/Search FC Thru Title Searches	-520,00	0.00	8 8 8	0.00	0.00	0.00	-520.00	0.00	0.00		0.00	
08/01/2013	. ·	27/30/2013	Property Inspection Fee Late Charge Assessment	-1,202.99	0.00	0.00	0.00	0.00	-1,202.99	0.00	0.00	0.00		0.00	
09/01/2013	• د	08/26/2013	Property inspection rec Late Charge Assessment property Inspection Ree	-1,202.51	0.00	0.00	0.00	0.00	-1,202.51	-10.50	0.00	0.00		0.00	,
1,102/10/0	. H	10/11/2013	Property Inspection Fee Property Inspection Fee Late Charge Assessment	-10.50	0.00	0.00	0.00	0.00	0.00	-10.50	000	0.00		0.0	
11/01/2013	-		Late Charge Assessment Tax Disbursement-WESTERLY TOWN	-1,201.33	0.00	0.00	98.	0.00	0.00	8 6 6	888	4,622,474.40	-102,78	0.00	
		11/21/2013		102,789.29	0.00	0.00	102,789.29	000	0.00	-10.50	888	0.00		0.00	
12/01/2013		2/18/2013		-1,200.74	0.00	9.0	0	888	0.00	-10.50	88	0.00	0.00	0.0	
	0	12/26/2013	Tax Disbursement-WESTERLY TOWN Property Inspection Fee	-10.	0.00	0.00	0.00	0.00	00.0	-10.50	8 8 8		0.00	0.00	
01/01/2014		A1W/15/10	Late Charge Assessment	-1,200.15	0.00	0.00	0.00	0.0	0.00	-10.50	00.0	0.00	0.00	0.00	
02/01/2014	•	11/31/4014	Late Charge Assessment	-1,199.57	0.00	0.00	0.00	0.0	-1,199.57 0.00	-10.50	00.0	00.0	00.0	0.00	
03/01/2014	•	02/26/2014	Property Inspection red Late Charge Assessment	-1,199.57	00.0	0.00	0.00	0.00	-1,199.57 0.00	0.00	0.00	0.00	00.0	0.0	
04/01/2014	J	04/10/2014	Property Inspection Fee Late Charge Assessment	-1,199.57	00.0	8.6.6	000	0.0	-1,199.57	0.00	0.00	9.0	0.00	0.00	
05/01/2014	J	04/25/2014	Property Inspection Pee Late Charge Assessment	-15.00	0.00	0.0	0	86.6	-1,199.57	0.00	00.0	0.00	0.00	0.00	
	3106/41/4	05/27/2015	Tax Disburgement-WESTERLY TOWN skin Trace/Search	466.	0.00	0.00	0.00	0.00	00.0	0.00	88	4,622,474.40	-167,693.99	0.00	
	07/17/2015		FC Thru Title Searches	3,50	0.00	0.0	0.00	0.00	000	3.50	388	4,622,474.40	-167,693.99	0.00	
•	1/11/2015	10/27/2015	Property inspection Fee	-13.25	0.00	0.00	0.00	0.00	00.0	-13.25	0.00	0.00	00.00	0.0	
	#	11/06/2015	Title Report Fee Property Inspection Fee	-13.25		0.00	0.00	0.00	0.00	-13.25	0.00	0.00	00.0	0.0	
	۰.0	12/31/2015	Property Inspection Fee Property Inspection Fee	-13.25		8.6	0.00	0.0	00.0	-13.25	0.00	0.00		0.0	
		2/01/2016	Sale Publication	-714.88		9.0	0.00	0.00	0.0	-425.00	0.00	00.0	00.0	0.0	
		12/01/2016	FC Thru Complaint	-125.00		0.00	0.00	0.00	0.00	-6.53	00.0	00.0		0.0	
	. 0	12/22/2016	Skip Trace/Search	-5.30		0.00	0.00	0.00	0.00	-50.00	00.0		0.00	0.00	
	-0	12/22/2016	Additional/Hourly/Court Appear Service of Process			0.0	0.00	0.00	0.0	-56.54	00.00	0.00		0.0	
	JC	12/22/2016	Selling Officer/Sheriff Cancel Property Inspection Fee			0.00	00.0	00.0	6.6	-13.25	00.0	0.00	0.0	0.0	
	. 0	13/08/2016	Sale Publication			0.00	00.0	0.00	9.6.	-425.00	88	•	00.0	0.00	
	-0	04/01/2016	Tax Disbursement-WESTERLY TOWN			0.00	' :	0.00	0.6	0.00	88	4,622,474.40	-167,695.99	0.0	
	96	35/13/2016	Tax Disbursement-WESTERLY TOWN			0.00	-42,717.83	0.00	0.0	00.0	2 2	4,622,474.40	-210,438.82	0.0	
	. ~	1/14/2016	FC Thru Judgment			00.00	0.00	0.00	0.0	-556.25	80.0	0.00		0.0	
-	1 2/25/2016	11/28/2016	Property Inspection Fee Investor Billable Exp Payment			0.00	0.00	0.00	0.0	0.0	0.00	4,622,474.40		0.0	
	2/25/2016		Investor Billable Exp Payment			0.00	00.0	0.00	0.00	00.00	0.00	4,622,474.40		0.0	
	2/25/2016		Investor Billable Exp Payment			0.00	0.00	0.00	0.00		00.0	4,622,474.40		8.6.6	
	2/25/2016		Investor Billable Exp Payment Investor Billable Exp Payment			00.0	00.0	0.0	0.00		0.00	4,622,474.40		0.0	
	2/25/2016		Investor Billable Exp Payment Investor Billable Exp Payment			0.00	0.00	0.00	0.00	00.0	00.0	4,622,474.40		0.0	
	12/25/2016		Investor Billable Exp Payment			0.00	0.00	0.00	0.00		0.00	4,622,474.40		8.6	
-	2/25/2016	12/27/2016	investor billable Expression Property Inspection Fee			0.00	00.00	0.00	0.0		00.0	0.00		0.0	
	J 0	11/26/2017	Property Inspection Fee Property Inspection Fee	-13.25		0.00	0.00	0.0	0.00		00.00	0.00		0.0	
	J C	5/17/2017	Property Inspection Fee	-13.25		000	0.00	0.00	888	-14.50	00.0	0.00	0.00	0.00	• •
	<b>.</b>	05/31/2017	Property Inspection Fee Property Inspection Fee	-14.50		0.00	0.00	0.00	0.00		00.00	0.00		0.00	_

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1																									
	Suspense	0.00	0.00	0.00	0.0	00.0	0.00	0.00	0.00	0.00	00.0	00.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	00.00	0.00	0.00	
	Escrow Balance	00.0	0.00	00.0	90.0	00.0	0.00	0.00	0.00	00.0	00.0	00.0	0.00	0.00	0.00	00.0	0.00	0.00	0.00	00.00	00.00	0.00	0.00	00.00	
-210,438.82	Principal Balance	0.00	0.00	0.00	0.00	8.0	00.0	0.00	0.0	0.00	0.00	0.00	0.00	0.0	00.0	0.00	00.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
ESCROW BAL:	Suspense Application	0.00	0.00	0.00	00.0	0.00	9.0	00.0	0.00	0.00	0.00	00.0	0.00	0.00	00.0	0.00	00.0	0.00	00.0	0.00	0.00	00.00	00.00	00.0	
	Fees/ Other (See Description)	-14.50	-14.50	-14.50	-14.50	-14,50	14.50	-10.84	-110.00	-14.50	-14.50	-5.46	-22.10	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	-6,231.49	
	Late Charges	0.00	00.00	0.00	0.00	0.0	00.0	00.0	0.00	00.00	0.00	00.00	00.00	0.00	00.0	0.00	0.00	0.00	0.00	0.00	0.00	00.0	0	1,282.05	
	Optional Products	0.00	0.00	0.00	0.00	0.00	9.0	900	0.00	0.00	00.0	00.0	0.00	00.00	00.0	0.00	00.0	00.0	00.0	00.00	00.00	00.0		0.00	
	Bscrow Application	0.00	0.00	0.00	0.00	0.00	6.0	8.6	00.0	0.00	00.00	0.00	00.00	0.00	0.00	00.0	0.00	0.00	0.00	0.00	0.00	00.0	6.6	0.00	
ATPENT DOS: 03/01/2012 1200 Reservoir Ave Cranston RI 02920-6012	Interest	00.0	0.00	00.00	0.00	0.00	0.00	0.0	9 6	00.0	8 6	0.0	0.00	0.00	0.00	0.00	0.00	0.00	00.0	00.0	90	8 6		0.00	
MAIL: 1200 Reservoir Ave Cranston RI 02920-6012	Principal Application	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9 6	6		8.0	00.0	00.0	0.00	0.00	00.00	000				3 6	8.6	0.00	
3 2	Amount Applied/ Assessed	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	-14.50	10.01	14 50	14.50	-14.50	22.10	14.50	-14.50	-14.50	-14 50	14.50	95.5	02.57	00.51	00.5	00.11	0.00	
INVESTOR#: 4009 POLG#: 1	Description	Dronarty franchition Was	Property Inspection Fee	Property Inspection Ree				Property Inspection Fee	Service of Process			Property Inspection Fee	SALD MACE/SERICH	Description Introduction	Property Inspection	Droperty Inspection	Discounting Inspection	Frupercy impecution	Property mapeurion	Property inspection	Property inspection	Property inspection	Property Inspection	Property Inspection Ending Balance	the state of the s
	Date Assessed/ Transaction Date	C MC/ CO/ 60	09/08/2017	70/10/2017	11/13/2017	72/21/21	01/11/108	02/14/2018	02/27/2018	8T0Z/90/E0	03/21/2018	04/18/2018	87/26/2018	01/2/00/50	05/20/2018	08/20/2mg	000/00/00	10/00/00	10/22/2418	12/03/2018	01/04/2019	02/06/2019	03/01/2019	04/26/2019	
Caito Valley Rd 02891-5622	Date Payment Received																								
LOAN#: BORNI: Katherine L Caito BORN2: PROP: 16 Yosemite Valley Rd Westerly RI 02891-5622	Date Payment Due																								
LOAN#: BORR1: BORR2: PROP:	Check/ Ref. Number	-																							